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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-third session
Geneva, 25 June-4 July 2018
Item 5 (b) of the provisional agenda
Transport of gases: miscellaneous

Clarification of a marking provision for UN pressure receptacles

Transmitted by the International Organisation for Standardisation (ISO)*

Introduction

1. The proposal in this document is a revised version of proposal 2 presented at the fifty first session in document ST/SG/AC.10/C.3/2017/18. This new proposal has been reworded to take account of comments made on the original proposal.

Proposal

2. Add the following new Note immediately after 6.2.2.7.2 (c):

"***NOTE*:** For the purpose of this mark the country of approval shall be understood to be the country of the competent authority that either carried out the initial inspection and test of the individual receptacle at the time of manufacture or delegated that initial inspection and test to an inspection body in accordance with 6.2.2.5.2.2.".

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

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Justification

3. Paragraph 6.2.2.7.2 of the Model Regulations specifies the "certification marks" on a pressure receptacle. These are:

(a) the United Nations packaging symbol …;

(b) the technical standard (e.g. ISO 9809-1) used for design, manufacture and testing;

(c) the character(s) identifying the country of approval as indicated by the distinguishing sign used on vehicles in international traffic;

(d) the identity mark or stamp of the inspection body that is registered with the competent authority of the country authorizing the marking;

(e) the date of the initial inspection, the year (four digits) followed by the month (two digits) separated by a slash (i.e. "/");

4. In Europe, where a type approval may be obtained from one country and then the manufacturer may select an inspection body from another country for the initial inspection, questions were asked as to whether the country of approval referred to the approval of the type or the approval at the time of initial inspection. The concept of the drafters of the marking text in 6.7.7.2 was to ensure traceability to the inspection body that inspected the individual pressure receptacle. The identity of the body applying the initial inspection mark may need to be verified by enquiry to the competent authority, hence the need arises to identify the country. The details of the type approval would be recovered from the manufacturer that is also obliged to apply its mark and the type approval is also known to the body applying the initial inspection mark. If the country of type approval were marked, it may be very difficult to identify the body carrying out the initial inspection unless its appointing country is also marked.

5. Space on a gas cylinder is limited and the country of manufacture and the country approving the individual cylinder is already identified, to add details of the type approval is not really feasible.

6. Some members of the Sub-Committee expressed their opinion that the initial inspection should be carried out by the same body that carried out the type approval. However, 6.2.2.5.5 *Production inspection and certification* states:

> "The inspection body selected by the manufacturer for inspection and testing during production may be different from the inspection body used for the design type approval testing."

7. One comment on the original proposal objected to defining the country of approval as being anything other than the country approving the type. This new note therefore starts with the phrase "For the purpose of this mark…" so that this interpretation is restricted to this application and is not taken as a general definition.

8. Another commenter pointed out that the conformity assessment system of 6.2.2.5, to which these marking requirements apply, specified that the appointment of an inspection body was optional (see 6.2.2.5.2.2) and the competent authority may itself carry out conformity assessment. The note has therefore been expanded to describe both options.

9. Discussions in Europe culminated in the adoption of a Note into the RID/ADR similar to that above and repeated in document ST/SG/AC.10/C.3/2017/18. However, elsewhere in the world, the question is still asked and sometimes the wrong alternative is employed. ISO requests that this issue is clarified by adoption of the Note proposed above.